

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

PUBLIC UTILITIES COMMISSION 89 Jefferson Boulevard Warwick, Rhode Island 02888 (401) 941-4500

Chairperson Margaret E. Curran Commissioner Marion S. Gold Commissioner Abigail Anthony

DISTRIBUTED GENERATION INTERCONNECTION NATIONAL GRID REPORTING REQUIREMENTS – AFFECTED SYSTEM OPERATOR STUDIES

On October 11, 2019, the Rhode Island Public Utilities Commission (PUC) voted to adopt the following reporting and process requirements related to Affected System Operator (ASO) Studies affecting Distributed Generation (DG) applications.

All periodic monthly submissions to the PUC are due electronically on the 15th of each month commencing November 15, 2019. A service list for governmental entities is attached. Stakeholders may access the filings from: http://www.ripuc.org/utilityinfo/DGRept.html.

- 1. If The Narragansett Electric Company d/b/a National Grid (National Grid) becomes aware that there is the potential need for an ASO study for any DG application for interconnection of a facility that is less than 5 megawatts (MW), National Grid must immediately notify the DG applicant in writing of the potential and include:
 - a. An explanation of why National Grid believes there is a potential need for an ASO study;
 - Whether and what additional information is needed to determine if an ASO study is necessary;
 - c. Expected date when National Grid will know whether an ASO study is necessary; and
 - d. Potential impact on interconnection timeline and costs.

- 2. Following initial notification required by Paragraph 1, National Grid shall provide written monthly updates to the DG applicant that include:
 - a. Whether and what additional information is needed to determine if an ASO study is necessary;
 - b. Expected date when National Grid will know whether an ASO study is necessary; and
 - c. Potential impacts on interconnection timelines and costs.
- 3. Upon commencement of an ASO study for any DG application, National Grid shall provide monthly written updates to the DG applicant that include:
 - a. Scope and process of the ASO study;
 - b. Roles and responsibilities of all parties involved in executing the ASO study;
 - c. Standards and jurisdiction of the ASO study;
 - d. Estimated timeline for completion of the ASO study;
 - e. Estimated necessary system modifications and associated costs; and
 - f. Study results as they become available.
- 4. National Grid must file a monthly report with the PUC indicating whether it is experiencing DG saturation in any region or at any substation that indicates the potential need for an ASO study that would affect three or more DG applications or more than 15 MWs of DG capacity in the following 6 months, and what actions National Grid is taking to prevent, mitigate, and prepare for such an occurrence. The first of these reports must be filed by or before October 8, 2019, with each following report due by the first of the month.
- 5. If National Grid becomes aware that there is the potential need for an ASO study that will implicate three or more DG applications or more than 15 MWs of DG capacity, National Grid must immediately notify the PUC in writing and include:

- a. An explanation of why National Grid believes there is a potential need for an ASO study;
- Whether and what additional information is needed to determine if an ASO study is necessary;
- c. Expected date when National Grid will know whether an ASO study is necessary;
- d. Areas/substations potentially impacted;
- e. Number of DG applications potentially affected and total associated MWs;
- f. A spreadsheet with details of each affected DG application, including but not limited to: application number, current application status, substation and town/city at which DG application is seeking to interconnect, alternating current nameplate capacity, and estimated date on which the project would be authorized to interconnect without the ASO study;
- g. Details of National Grid's communications with ISO New England Inc. and any other
 Affected System Operators;
- h. How the situation has impacted interconnection timelines to date;
- i. If found necessary, how the ASO study would impact interconnection timelines;
- j. Any proposed resolutions National Grid is exploring to enable some affected DG applications to proceed with the interconnection process prior to completion of the ASO study;
- k. National Grid's plan to address the situation and minimize delays to interconnection timelines of affected DG applications; and
- A draft written notification to potentially affected DG applicants for PUC review.
 The written notification should include: items a-e above, and potential impacts on interconnection timelines and costs.

- 6. Once approved by the PUC, National Grid shall immediately issue the notification required under Paragraph 5(l) to all potentially affected DG applicants and post the notification on its website or a website dedicated to ASO studies in National Grid's service territory.
- 7. Following initial notification required by Paragraph 5 above, National Grid shall provide written monthly updates to the PUC and all potentially affected DG applicants (including posting on National Grid's website) that include:
 - a. Whether and what additional information is needed to determine if an ASO study is necessary;
 - b. Expected date when National Grid will know whether ASO study is required;
 - c. Potential impacts on interconnection timelines and costs;
 - d. Any proposed resolutions that National Grid is exploring to enable some affected
 DG applications to proceed with the interconnection process prior to completion of the ASO study; and
 - e. National Grid's plan to address the situation and minimize delays to interconnection timelines of potentially affected DG applicants.
- 8. If the potentially affected DG applicant pool is modified at any point, National Grid shall provide the PUC with an updated spreadsheet as detailed in Paragraph 5(f) above, highlighting the modifications.
- 9. Upon commencement of an ASO study that implicates three or more DG applications or more than 15 MWs of DG capacity, National Grid shall provide monthly written updates to the PUC and all affected DG applicants (including posting on National Grid's website) that include:

- a. Scope and process of the ASO study;
- b. Roles and responsibilities of all parties involved in executing the ASO study;
- c. Standards and jurisdiction of the ASO study;
- d. Estimated timeline for completion of the ASO study;
- e. Estimated necessary system modifications and associated costs;
- f. A prioritization system to determine which of the affected DG applications would be eligible to interconnect first if capacity became available;
- g. Any proposed resolutions National Grid is exploring to enable some affected DG
 applications to proceed with the interconnection process prior to completion of the
 ASO study; and
- h. Study results as they become available.

A call with PUC staff may be scheduled at a mutually agreeable time to address any questions about the written updates.

10. Throughout the ASO study process, National Grid shall (a) provide affected DG applicants with the contact information of a knowledgeable National Grid employee who can answer inquiries related to the ASO study in a timely manner and (b) hold stakeholder meetings to provide updates and a forum for Q&A as needed.